

StyleCraft

C O R P O R A T I O N

Custom Cabinets by Master Craftsmen

July 26, 2012

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KCMA
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Ref: Proposed EPA regulation to implement formaldehyde standards for composite wood products.

Dear Dick,

I need to bring to your attention the fact that once again a government rule, if applied with an indiscriminate broad brush, threatens the life and competitiveness of mine and many other small manufacturers in the wood products industry.

Shops like mine (23 employees) do a very tiny bit of veneering. It usually is to correct a mistake, cover a radius, or line the inside of a special cabinet. But in an entire year, it would amount to only a few hundred square feet of work. Any large needs for special veneers are ordered from a variety of hardwood plywood suppliers for whom the law was intended.

In the past, we have asked for, and often been granted, with no negative effect to the environment, the right to be exempted from rules written to control large operations with large emissions. The EPA did it for the furniture finishing MACT where a 10 and 25 tpy cutoff applied. The same practical approach could be applied to this regulation.

In the current business climate, we need every advantage we can get. Small as it might seem, the ability to continue to apply veneers is very important to maintaining our competitive edge and our ability to offer a distinctive product to a customer base with a wide range of choices from all over the world.

If there is anything that can be done to modify this regulation or its application, it would mean that we would not be negatively impacted by an unnecessary and costly regulation. We are all fighting to preserve our businesses and the welfare of our employees in these difficult times.

Many thanks,


David Rothermel

Number Firms, Number Establishments, Employment, & Annual Payroll by Enterprise Employment Size for US, All Industries: 2009

release date: 11/2011

NAICS CODE	NAICS DESCRIPTION	ENTERPRISE EMPLOYMENT SIZE	NUMBER OF FIRMS	NUMBER OF ESTABLISHMENTS	EMPLOYMENT	EMPLOYMENT NOISE FLAG	ANNUAL PAYROLL (\$1,000)	ANNUAL PAYROLL NOISE FLAG
33711	Wood kitchen cabinet and countertop manufacturing	1: Total	8,132	8,214	96,094	G	2,883,897	G
33711	Wood kitchen cabinet and countertop manufacturing	2: 0-4	4,701	4,701	9,130	G	228,424	G
33711	Wood kitchen cabinet and countertop manufacturing	3: 5-9	1,786	1,786	11,595	G	317,819	G
33711	Wood kitchen cabinet and countertop manufacturing	4: 10-19	956	957	12,766	G	382,162	G
33711	Wood kitchen cabinet and countertop manufacturing	5: <20	7,443	7,444	33,491	G	928,405	G
33711	Wood kitchen cabinet and countertop manufacturing	6: 20-99	581	591	21,155	G	679,302	G
33711	Wood kitchen cabinet and countertop manufacturing	7: 100-499	87	105	15,288	G	459,888	G
33711	Wood kitchen cabinet and countertop manufacturing	8: <500	8,111	8,140	69,934	G	2,067,595	G
33711	Wood kitchen cabinet and countertop manufacturing	9: 500+	21	74	26,160	H	816,302	G

32191	Millwork	1: Total	3,831	4,130	108,236	G	3,573,376	G
32191	Millwork	2: 0-4	1,529	1,531	2,856	G	85,981	G
32191	Millwork	3: 5-9	709	711	4,818	G	127,366	G
32191	Millwork	4: 10-19	655	660	8,873	G	260,453	G
32191	Millwork	5: <20	2,893	2,902	16,547	G	473,800	G
32191	Millwork	6: 20-99	686	724	24,653	G	765,386	G
32191	Millwork	7: 100-499	175	232	20,832	G	665,906	G
32191	Millwork	8: <500	3,754	3,858	62,032	G	1,905,092	G
32191	Millwork	9: 500+	77	272	46,204	G	1,668,284	G


337122	Nonupholstered wood household furniture manufacturing	1: Total	2,741	2,778	39,347	G	1,079,523	G
337122	Nonupholstered wood household furniture manufacturing	2: 0-4	1,666	1,672	2,950	G	73,366	G
337122	Nonupholstered wood household furniture manufacturing	3: 5-9	503	505	3,290	G	81,259	G
337122	Nonupholstered wood household furniture manufacturing	4: 10-19	267	269	3,605	G	93,599	G
337122	Nonupholstered wood household furniture manufacturing	5: <20	2,436	2,446	9,845	G	248,224	G
337122	Nonupholstered wood household furniture manufacturing	6: 20-99	231	239	9,143	G	259,045	G
337122	Nonupholstered wood household furniture manufacturing	7: 100-499	49	54	7,139	G	186,694	G
337122	Nonupholstered wood household furniture manufacturing	8: <500	2,716	2,739	26,127	G	693,963	G
337122	Nonupholstered wood household furniture manufacturing	9: 500+	25	39	13,220	G	385,560	G

FAX TRANSMISSION

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KITCHEN CABINET MANUFACTURERS ASSOCIATION
1899 Preston White Drive, Reston, Virginia 20191
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TO: Jim Aguila
Lynn Baker
(916) 327-5621

FROM: Dick Titus 

SUBJECT: Veneering Issue

DATE: October 26, 2007

Several additional companies have responded to the KCMA survey on veneering operations. To date, I have received responses from 61 companies (31%) of our fabricator membership:

- 44 of the 61 respondents (72%) do NOT veneer
- 12 of the 61 (20%) veneer, but do not use urea formaldehyde adhesives
- 4 of the 61 (7%) veneer and use urea formaldehyde adhesives

Typical examples of veneering operations include:

- (1) top and bottom rails of curved doors
- (2) repair
- (3) raised center panel door components
- (4) 5-piece drawer fronts
- (5) wood hoods
- (6) end panels (typically 2'x3')

As you can see, for the most part, the veneering cabinet manufacturers do is for specialized operations with relatively small pieces or components comprising 10%-20% or less of the finished cabinet. The panels that are made would possibly be an end panel, which is several times smaller than the ANSI/HPVA HP-1-2004 definition for plywood that has been used for many years. The definition HPVA has created for you is a new definition that has not gone through any ANSI approved review process.